

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., et al.

Plaintiffs,

Case No. 2:23-cv-00512

v.

Judge Sarah D. Morrison

BRINSON CALEB SILVER, et al.,

Magistrate Judge Chelsea M. Vascura

Defendants.

**SILVER DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
MOVE OR PLEAD AND TO RESPOND TO PENDING DISCOVERY REQUESTS**

Defendants Brinson Caleb Silver, Eclipse Home Design, LLC, and Collateral Damage, LLC, (collectively, the “Silver Defendants”) move this Court for an order granting the Silver Defendants up to and including June 16, 2023, to answer, move, or otherwise respond to Plaintiffs’ Amended Complaint. The Silver Defendants’ response is currently due Thursday, June 1, 2023. A brief two-week extension is necessary to allow the Silver Defendants’ new counsel to fully review and develop responses to the Amended Complaint and is not for the purpose of delay. Three prior extensions have been granted to the Silver Defendants, but each was requested by prior counsel before their withdrawal from representation on May 12, 2023.

The Silver Defendants further move this Court for an order granting the Silver Defendants up to and including June 16, 2023, to respond to Plaintiffs’ outstanding discovery requests. Currently, the Silver Defendants’ response to discovery is due Friday, June 2, 2023. Undersigned counsel was retained to represent the Silver Defendants in this action on May 30, 2023, and need sufficient time to review the discovery requested and to fully respond, and is not for purposes of delay. One prior extension was granted to the Silver Defendants.

As required by Local Civil Rule 7.3, the Silver Defendants' counsel consulted with Plaintiffs' counsel, who have stated that Plaintiffs do not oppose this motion.

Respectfully submitted,

/s/ Matthew L. Jalandoni

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Damage, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the represented parties by operation of the Court's electronic filing system. Notice of this filing will be sent to all other parties not represented by counsel via regular U.S. Mail.

/s/ Matthew L. Jalandoni

Matthew L. Jalandoni

*Counsel for Defendants, Brinson Caleb Silver,
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Damage, LLC*